

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,)	Criminal No. 23-063(1) (KMM/DJF)
)	
Plaintiff,)	
v.)	DEFENDANT'S MOTION FOR
)	DISCOVERY AND INSPECTION
VATTHANA ANDY)	
SENGSOURIYA,)	
)	
Defendant.)	

Defendant, Vatthana Andy Sengsouriya, by and through his attorney, Jean M. Brandl, Assistant Federal Defender for the District of Minnesota, respectfully moves the Court and requests the government to disclose the following information:

1. Any and all written, recorded, or oral statements made by Mr. Sengsouriya or copies thereof within the possession, custody or control of the government, the existence of which is known, or by the exercise of due diligence may become known to the attorney for the government.

2. The substance of any oral statement which the government intends to offer in evidence at the trial made by Mr. Sengsouriya, whether before or after arrest.

3. A copy of the prior criminal record of Mr. Sengsouriya, which is known, or by the exercise of due diligence may become known to the attorney for the government including the following:

- (a) each prior sentence of imprisonment exceeding one year and one month;
- (b) each prior sentence of imprisonment of at least sixty days;

(c) information regarding whether Mr. Sengsouriya is alleged to have committed the instant offense while under any criminal justice sentence; including probation, parole, supervised release, imprisonment, work release, or escape status;

(d) information regarding whether Mr. Sengsouriya is alleged to have committed the instant offense less than two years after release from imprisonment on the sentence included under (a) or (b) above.

4. Permission for Mr. Sengsouriya to inspect and/or copy books, papers, documents, photographs, tangible objects, or recordings which are within the possession, custody or control of the government and which are material to the preparation of the defense or are intended for use by the government as evidence in chief at the trial, or were obtained from or belonged to the defendant.

5. Permission to inspect and/or copy any results or reports of physical or mental examinations and of scientific tests or experiments or copies thereof which are within the possession, custody or control of the government.

If, prior to trial, the government discovers additional evidence or material previously requested or ordered which is subject to discovery or inspection hereinbefore requested, the government is requested to notify attorney for the defendant the existence of the additional material.

Dated: April 20, 2023

Respectfully submitted,

s/ Jean M. Brandl

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